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March 17, 2020

BY ECF

The Honorable Debra Freeman
United States Magistrate Judge
U.S. District Court Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 17A
New York, New York 10007

Re: Commonwealth of Pennsylvania v. Exxon Mobil Corp., et al., Case No. 14-cv-06228
Joint Request for 120-Day Adjournment of Deadlines

Dear Judge Freeman:

The parties hope that this joint letter finds the Court safe and well.

Based on the current situation, Defendants and Plaintiff request that all existing deadlines in the Court's scheduling orders for this matter, including the dates for completing Non-Site Specific and Site-Specific discovery, be adjourned and extended by 120 days. Although the parties have been engaged in written discovery and depositions for some time, most witnesses and counsel now are prohibited from traveling or attending meetings, or wish to refrain from such travel and meetings. This has made further deposition practice nearly impossible. Likewise, because clients for both sides have been instructed to work remotely, the gathering and review of discovery materials has become extremely difficult.

To be clear, the parties are not asking that this case be stayed. Both sides have conferred and agree that there is significant work that can and will be done in this case while current events get sorted out. This includes, if Your Honor wishes, the parties' availability for an in-person or telephonic hearing to address pending matters.

We appreciate the Court's consideration of this joint request.

Respectfully submitted,

/s/ James A. Pardo

James A. Pardo
On behalf of Defendants

Respectfully submitted,

/s/ Duane C. Miller

Duane C. Miller
On behalf of Plaintiff

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Cc: All Counsel of Record (by LNFS)

SO ORDERED THAT ALL DEADLINES ARE
ADJOURNED AND EXTENDED BY 120 DAYS

Hon. Deborah Freeman
March __, 2020